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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 21-00164 CRB
)	
Plaintiff,)	UNITED STATES' STATEMENT REGARDING
)	DEFENDANT'S BOND MODIFICATION
v.)	REQUEST
)	
DOUGLAS JAE WOO KIM,)	Judge: Hon. Thomas S. Hixson
)	
Defendant.)	

In connection with Defendant Douglas Jae Woo Kim's request that the Court relax the conditions of his pretrial release, the government requests that the Court (Hon. Thomas S. Hixson) review the following filings made by the government in this case, which are relevant to the economic danger Mr. Kim poses to the community:

ECF Number	Description of Filing
157	United States' Motion to Order Defendant Detained (Apr. 16, 2024)
157-1 (Under Seal Version)	Declaration of FBI Special Agent Jennifer Barnard in Support of United States' Motion for Detention (Apr. 16, 2024)

ECF Number	Description of Filing
181	United States' Notice of New Information Regarding Defendant's Pretrial Release Conduct (May 1, 2024)
181-1 (Under Seal Version)	Declaration of FBI Special Agent Jennifer Barnard in Support of United States' Notice of New Information Regarding Defendant's Pretrial Release Conduct (May 1, 2024)
195	Second Superseding Indictment (¶¶ 22-30 & Count 7)

At the hearing, the government may reference the transcripts of the detention hearings held before Judge Breyer on April 22, 2024 and April 24, 2024 (ECF 186 & 187) but is not requesting that the Court review these transcripts in advance of the hearing.

DATED: July 25, 2024

Respectfully submitted,

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/s/
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